



Delta Diablo Sanitation District

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March 17, 2008

Regional Water Quality Control Board,
Central Valley Region
Attn: Pamela Creedon, Executive Officer
11020 Sun Center Drive, Suite 200
Rancho Cordova, CA 95670

SUBJECT: TENTATIVE WASTE DISCHARGE REQUIREMENTS FOR IRONHOUSE
SANITARY DISTRICT

Dear Ms. Creedon:

Delta Diablo Sanitation District (DDSD) appreciates the opportunity to provide comments on the Tentative Waste Discharge Requirements for Ironhouse Sanitary District (ISD) issued by the Region 5 Board on February 11, 2008. Both DDSD and ISD have studied a potential integrated regional solution since early 2005. As a result of those studies, ISD included two alternatives in its Final Supplemental Environmental Impact Report (FSEIR) certified by its Board on January 16, 2007. The two alternatives (Alternatives B and C) include conveying ISD's discharge (either treated or untreated) through conveyance pipelines for approximately ten miles to New York Slough in Region 2, where DDSD currently discharges the treated effluent from a population of approximately 200,000 people, as well as the blowdown discharge from two combined cycle power plants that have a combined peaking capacity of over 1300 megawatts. DDSD's discharge permit allows for the collection, treatment, and discharge of effluent from communities and industries located in both Region 2 and Region 5 (city of Antioch).

From DDSD's perspective, the potential advantages of implementing either the Alternative B or C regional solution include: discharging wastewater effluent in the brackish zone of the lower Delta, rather than closer to the center of the Delta where salinity control points are used to determine upstream reservoir releases and meet Endangered Species Act requirements; potential cost savings to both Districts' customers; and using the ISD flows to augment the growing demand for recycle water usage of existing and new power generators within the DDSD service area. For example, in 2007, DDSD was approached by three power generators hoping to secure a supply of recycled water for cooling purposes. Because projected recycle water supplies from DDSD do not meet the anticipated demand, a regional industrial recycled water study is proceeding, and includes DDSD, ISD, Central Contra Costa Sanitary District, Contra Costa Water District, and the Cities of Pittsburg and Antioch as participants. That study will analyze opportunities to import water from the surrounding wastewater districts for use as recycled water for industries in the DDSD service area, and is scheduled to be completed in November 2008.

Ms. Pamela Creedon

March 17, 2008

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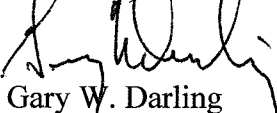
In its Staff Report to the Board of Directors on January 16, 2007, staff recommended Alternative A, which includes the expansion of its current treatment process by constructing an extended air (oxidation ditch) treatment with filtration and ultraviolet disinfection, and continuing the practice of land application of treated wastewater which eventually is discharged to the Delta. The Staff Report concluded that Alternative A is the most cost effective, environmentally superior, least complex alternative that can be developed. In addition, the Staff Report indicates that Alternative A allows ISD to maintain complete control over long-term decision making.

It would appear that the February 2008 Tentative Waste Discharge Requirements create a great amount of uncertainty in terms of the feasibility and treatment costs for constituents, including aluminum, iron, manganese, mercury, and salinity. The added costs to construct and operate the new treatment and discharge facilities, and the levels of certainty should be considered prior to moving forward with an individual discharge project, rather than an integrated regional solution.

As stated at the ISD Special Board Meeting on January 16, 2007, where the ISD Board certified the environmental document and approved Alternative A, DDSO continues to see great opportunities to work with ISD to develop an integrated regional solution if a decision is made to pursue that.

Please do not hesitate to contact me at (925) 756-1920 with any follow up questions or clarifications.

Sincerely,



Gary W. Darling
General Manager

GWD:dj

cc: DDSO Board of Directors
Tom Williams, General Manager, ISD
Bruce Wolfe, Executive Officer, CRWQCB, Region 5